

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Superior Barrel and Drum - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #6**
Removal Action continues with focus on HazCat
Superior Barrel and Drum

Elk, NJ
Latitude: 39.6930670 Longitude: -75.1345550

To: Keith Glenn, ERRD/RPB/ERT
Sophia Kelley, PAD
Dave Kluesner, EPA
Judith Enck, EPA
Beckett Grealish, USEPA Region 2, ERRD, RAB
Tim Grier, USEPA Headquarters 5202G
Dan Harkay, USEPA, Region 02, ERRD-RAB
Bonnie Hriczko, EPA
Gilberto Irizarry, USEPA Headquarters
Chris Jimenez, US EPA Region II
Delmar Karlen, USEPA Region 2 ORC-NJSFB
Doug Kodama, USEPA Region 2 ERRD
John LaPadula, USEPA, Region 2 ERRD-NYRB
Mary Mears, USEPA, Region 2, PAD
Eric Mosher, USEPA, Region 2, ERRD-RPB
Regional Response Operations Center, EPA
Mark Pane, USEPA, Region 02, ERRD-RAB
George Pavlou, EPA
Lisa Plevin, EPA
Andrew Raddant, Department of Interior
Andrew Raddant, US DOI
Elias Rodriguez, USEPA Region 02, PAD
Joe Rotola, USEPA Region 02
Eric J. Wilson, USEPA, Region 02, ERRD-RAB
George Zachos, USEPA Region 2 ERRD
Margaret Gregor, US EPA
Fred Mumford, NJDEP

From: Margaret Gregor, OSC/Environmental Scientist

Date: 10/13/2013

Reporting Period: 10/7/2013 to 10/13/2013

1. Introduction

1.1 Background

Site Number:	A23K	Contract Number:	EP-S2-10-01
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/30/2013	Start Date:	9/27/2013
Demob Date:		Completion Date:	
CERCLIS ID:	NJD986630705	RCRIS ID:	
ERNS No.:		State Notification:	8/29/2013
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

A Removal Action is required to identify remaining hazardous materials that are on-Site and properly contain and dispose of such.

1.1.2 Site Description

On August 29, 2013 the New Jersey Department of Environmental Protection (NJDEP) notified the United States Environmental Protection Agency (EPA) Region 2 Regional Emergency Operations Center (REOC) of deteriorated conditions at the Superior Barrel and Drum Site. NJDEP Emergency Response personnel requested the assistance of EPA On-Scene Coordinators (OSCs) with investigating conditions of containers at the facility.

On August 30, 2013 EPA OSCs met with NJDEP and Gloucester County officials at the Superior Barrel and Drum Site. Observed were thousands of containers, mostly 275-gallon totes and 55-gallon drums, located along a public road as well as in the woods, wetlands, and elsewhere throughout the property. Containers were stacked several high in various locations and were shown to be various states of deterioration. Containers were found to be leaking, void of tops, exposed to weather elements, rusted, damaged due to gunshots, stored improperly, and laying on their sides. Numerous trailers were also found to be open and containing 55-gallon drums. The containers throughout the Site appeared to be full of contents, however most did not have labels. Labels on some containers include flammable liquids, corrosive, marine pollutant, flammable solid, oxidizer, and non-hazardous material.

NJDEP referred the Site to EPA on August 30, 2013 due to the conditions at the Site, including drum contents spilled in wetlands, contents pooling alongside the road, and unsecured access to the facility.

1.1.2.1 Location

The Superior Barrel and Drum Site is located at 798 Jacob Harris Lane in Elk Township, Gloucester County, New Jersey (coordinates 39.6869, -75.132314). The facility consists of a main processing building and numerous trailers located throughout the 5.5-acre property. The entrance to the facility is down a dirt road. The north end of the Site is bordered by Industrial Drum Company, a competitor in the drum reconditioning business. A chain-link fence separates the two properties. Jacob Harris Lane marks the eastern boundary of the Site, beyond which is a densely forested property. To the south are private lands which are also densely wooded with several marshy areas. The western boundary is State Route 55, a major highway. Currently, the facility is inoperable with last known operation activity occurring in 2012. Several companies have been to the property in efforts to remove machinery and equipment. The Site is open to persons traveling along Jacob Harris Lane, a public road. The Site is unsecured from each direction and evidence of trespassers has been noted. All doors of the main building and trailers are open.

The Site consists of two operational areas. The main area is where the permanent steel structure is located. This area would receive containers, rinse the containers, and recondition them for future market. This area is approximately 2.4 acres with containers located throughout. The additional operational area appears to be mainly for storage of full 275-gallon totes and 55-gallon drums, with several trailers holding containers. This area encompasses approximately .32 acres of land. Both areas show signs of impact

from leaking containers or dumping of materials.

1.1.2.2 Description of Threat

The facility is located in a federally recognized wetland. Thousands of containers are in various conditions of deterioration and leaking containers have been noted. Many labels on containers indicate contents of hazardous substances, however the property owner and his attorney have stated that the drums are of unknown contents. The facility is unsecured with access from a public road and surrounding trails. Shot-gun shells from target practice on containers are evidence of trespassers, along with signs of vandalism.

Companies that are located in the immediate area, along Jacob Harris Lane, are on private water wells. Residential properties located along Whig Road (<1/4 mile away) and Aurora Road (<1/2 mile) are also on private well water.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

NJDEP collected samples from four (4) random containers, all 55-gallon drums. Field screening tests were conducted on them using Photoionization Detectors, HazMat ID, pH, flash point, and others. Contents revealed materials to be corrosive, highly flammable, and having high readings of volatile organic compounds (VOCs). The materials sampled did not reflect the labels on the containers.

A Removal Assessment was completed on September 27, 2013. Approximately 252 containers were opened and aliquots were collected for HazCat. Field laboratory results indicated the presence of hazardous characteristics. Samples were collected from select drums and totes where they were shipped to NELAC accredited laboratories. Analytical results showed toluene, benzene, TCE, PCBs, lead, and many other hazardous substances make up the contents of the containers. Soil samples also showed attribution between the materials in the containers and that in the soil.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Activities at the Superior Barrel and Drum Site continued during the operational period. An increase in ERRS personnel has aided in the expedited collection of HazCat aliquots. Field analysis of materials through the hazardous categorization technique continued to be the focus of operations. Preliminary analytical results continued to indicate the presence of CERCLA hazardous substances. EPA continued receiving validated data results, which also show that listed hazardous substances are in on-Site containers and surface soils.

EPA continued to work with numerous partners including the Gloucester County Fire Marshal's Office and HazMat Team, NJDEP, U.S. Fish and Wildlife Service, and local officials. Twenty-four hour Site security continued with the aid of a security firm.

2.1.2 Response Actions to Date

To view removal actions completed during other operational periods, please refer to previous Pollution Reports.

On October 7, 2013, setup for the removal action was completed. Fences designating work zones were reinforced to withstand heavier winds. On October 8, 2013, additional ERRS personnel arrived on-site and underwent orientation and safety training. ERRS personnel continued to move containers to facilitate access for sampling, open and assess containers, collect aliquots of the container material, and perform HazCat field tests. The additional ERRS personnel allowed for two teams to open, assess and sample on-site containers. This increased the pace of aliquot collection, which is advantageous to complete before the winter months when materials within the containers will begin to freeze.

RST staff on-site were reduced and the remaining RST personnel continued to manage all data from analytical laboratories, maintain all perimeter air monitoring activities, manage handheld air monitoring equipment, maintain Scribe and DrumTrak databases and document on-site operations.

On October 10, 2013, EPA and RST reviewed all preliminary sampling data and identified containers which had the highest levels of contaminants. A Site walk was conducted to identify these containers and assess the condition of each. While most were in relatively poor condition, it did not appear that any were actively leaking onto the ground surface.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA has designated Bonnie Hriczko as the enforcement case officer. A 104(e) was drafted and submitted to the property owner. Files have been located on-site and the enforcement officer has reviewed such files for additional PRPs.

2.1.4 Progress Metrics

	Number of Aliquots for HazCat Collected ¹	Number of Confirmatory Samples*	Number of Surface Soil Samples*	Number of Surface Water Samples*
Cumulative Total	649	79	36	4

¹Several containers were opened but aliquot and sample collection was not possible. This count does not include those containers.*Does not include duplicate samples or MS/MSDs for QA/QC.

Haz Class	Acid	Neutral	Potential Oil	Flammable	Oxidizer	Base	Chlorinated	HazCat Complete
Cumulative Total	19	352	64	253	28	19	36	563

The following table will be completed once transport and disposal operations begin.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Collaboration between EPA, NJDEP, FWS, County and local officials will continue throughout the removal activities at the Superior Barrel and Drum Site. During the next operational period, routine activities will continue. ERRS will continue to move and manage containers located on-Site. Personnel, utilizing Level B PPE, will continue to assess containers and collect aliquots of materials for field testing. RST personnel will continue to manage perimeter air monitoring equipment.

2.2.1.1 Planned Response Activities

The short term goals of the project focus on the HazCat of all containers located on-Site. An understanding of all container composition is necessary prior to proceeding with consolidation and removal of materials. Data management will continue to remain an integral part of operations to maintain organization of field data, analytical data, container identification, and HazCat progress.

2.2.2 Issues

The federal government shutdown, due to a lack of appropriations, continued for the duration of this operational period. As such, most support personnel, including other OSCs, public information officers, laboratory support staff, and others have been furloughed.

On October 7, 2013, heavy rain and extreme winds, which could have damaged monitoring equipment or presented safety hazards, forced aliquot collection and HazCat operations to halt several hours early. Minor flash flooding occurred on-site. The patterns of runoff confirmed that the berms surrounding the drum areas are properly oriented and capable of preventing a potential spill from migrating before a cleanup could be performed.

On October 7, 10 and 11, 2013, the ability to conduct perimeter air monitoring was restricted due to constant rains which would damage the equipment.

2.3 Logistics Section

All logistical issues are being handled by EPA Region 2, RST personnel or ERRS personnel.

2.4 Finance Section

2.4.1 Narrative

On September 4, 2013, \$250,000 has been given to the Kemron ERRS contract to perform an emergency removal assessment.

On September 27, 2013, \$600,000 was verbally authorized for the commencement of a Removal Action. The Action Memorandum is being drafted.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Assessment	\$250,000.00	\$128,000.00	\$122,000.00	48.80%
ERRS - Removal Action	\$600,000.00	\$55,000.00	\$545,000.00	90.83%
TAT/START	\$0.00	\$105,000.00	(\$105,000.00)	0.00%
Intramural Costs				
Total Site Costs	\$850,000.00	\$288,000.00	\$562,000.00	66.12%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety Officers have been identified through RST and ERRS. Health and Safety Plans have been completed by each contractor. Daily tailgate briefings are conducted. On October 4, 2013 safety demonstrations reviewed emergency evacuation procedures.

2.5.2 Liaison Officer

The OSC is acting Liaison Officer with local, State, and County officials. Additional meetings with government officials have been established and the OSC plans to meet with the Mayor of Elk Township.

2.5.3 Information Officer

Sophia Kelley has been designated as the Community Involvement Coordinator for the Superior Barrel and

Drum Site. Ms. Kelley can be reached at 212-637-3670. Elias Rodriguez is the press coordinator and can be reached at 212-637-3664. Christopher Sebastian is the inter-governmental liaison and can be reached at 212-637-3597. George Zachos is the Regional Public Liaison and can be reached at 1-888-BUDSMAN.

All public information officers listed above will be on furlough for the duration of the government shutdown. All questions from the press should be directed to press@epa.gov.

3. Participating Entities

3.1 Unified Command

Unified Command is currently not being used.

3.2 Cooperating Agencies

EPA is coordinating efforts with various entities that have proven to be extremely helpful in the success of this project, including but not limited to:

- NJDEP
- Gloucester County HazMat Team and Department of Emergency Response
- Gloucester County Fire Marshal and Fire Department
- Police Department
- Glassboro Water Department
- Elk Township

4. Personnel On Site

EPA (1 to 2)

RST Contractors - Weston Solutions (1)

ERRS Contractors - Kemron (11 to 12)

5. Definition of Terms

Assisting and Cooperating Agencies - Agencies who are assisting the EPA response, but are not a part of Unified Command.

CERCLA - Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 U.S.C. Section 9601).

E Goods - Electronic machines which contain hazardous components.

Emergency Response - any activity undertaken by the Operations Section which mitigated an immediate threat to human health or the environment.

EPA - United States Environmental Protection Agency

ERRS - Emergency and Rapid Response Services contract.

FRP - Facility Response Plan. Under the Clean Water Act, as amended by the Oil Pollution Act, a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a discharge, of oil. Required by certain facilities that store and use large quantities of oil.

FWS or U.S. FWS - United States Fish and Wildlife Service.

HazCat - Hazardous Categorization, a field technique which utilizes a series of chemical tests on samples collected in the field (aliquots) to determine the characteristics of hazardous and non-hazardous substances. The characteristics which can be determined include matrix (material state), solubility, combustibility, flammability, pH and the presence of oxidizers, peroxides, sulfides, PCB, cyanide.

Hazardous Debris - Debris which contains compounds that make it inappropriate for municipal landfill disposal

Household Hazardous Waste - Small quantity waste from households that contain corrosive, toxic, ignitable, or reactive ingredients is hazardous. This includes pesticides, paint, solvents, etc.

Monitoring - Using equipment which will give limited real-time information about constituents in environmental media. This method is used most often for air and water testing.

NELAC - National Environmental Laboratory Accreditation Conference.

NJDEP - New Jersey Department of Environmental Protection.

OSC - Federal On-Scene Coordinator.

OSHA - Occupational Safety and Health Administration.

PCBs - Polychlorinated biphenyls, a class of chemical compounds.

PPE - Personal protective equipment.

PRP - Potentially Responsible Party.

RCRA - Resource Conservation and Recovery Act.

REOC - EPA Region II Regional Emergency Operations Center.

RMP - Risk Management Plan. Under the Clean Air Act, certain facilities with large quantities of toxic potentially air born chemicals whose releases may impact human populations are required to submit to EPA a plan for hazard assessment, prevention, and emergency response.

RST - Removal Support Team contract.

Sampling -The process of taking environmental media for analysis at a laboratory of its constituents. These tests may require multiple days to complete, but test for a wider array of constituents than monitors.

Small Container - any container with a potential capacity of less than 5 gallons.

TRI - Toxic Release Inventory - A publicly available EPA database that contains information on toxic chemical releases and other waste management activities reported annually by certain covered industry groups as well as federal facilities. This inventory was established under the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and expanded by the Pollution Prevention Act of 1990.

TCE - Trichloroethylene.

Unified Command - A structure based on the Incident Command System (ICS) that brings together the Incident Commanders of all major organizations involved in the incident in order to coordinate an effective response, while at the same time allowing each to carry out their own jurisdictional, legal, and functional responsibilities.

White Goods - Large home electronics such as refrigerators, washing machines, and dryers.

WW - Wastewater Treatment Facilities.

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaossc.org/SuperiorBarrelAndDrum

6.2 Reporting Schedule

At a minimum, POLREPS will be generated on a weekly basis. Should emerging situations need to be provided to parties, spot reports or bulletins will be sent via email.

As of September 26, 2013 daily updates will no longer be provided.

7. Situational Reference Materials

www.epaossc.org/SuperiorBarrelAndDrum